

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

SHANNON PEREZ, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	CIVIL ACTION NO.
)	SA-11-CA-360-OLG-JES-XR
)	[Lead case]
v.)	
)	
STATE OF TEXAS, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
<hr/>)	
)	
MEXICAN AMERICAN LEGISLATIVE)	CIVIL ACTION NO.
CAUCUS, TEXAS HOUSE OF)	SA-11-CA-361-OLG-JES-XR
REPRESENTATIVES (MALC),)	[Consolidated case]
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
STATE OF TEXAS, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
<hr/>)	
)	
TEXAS LATINO REDISTRICTING TASK)	CIVIL ACTION NO.
FORCE, <i>et al.</i> ,)	SA-11-CA-490-OLG-JES-XR
)	[Consolidated case]
<i>Plaintiffs,</i>)	
)	
v.)	
)	
RICK PERRY, <i>et al.</i> ,)	
)	
<i>Defendant.</i>)	
<hr/>)	
)	
MARAGARITA V. QUESADA, <i>et al.</i> ,)	CIVIL ACTION NO.
)	SA-11-CA-592-OLG-JES-XR
<i>Plaintiffs,</i>)	[Consolidated case]
)	
v.)	
)	

RICK PERRY, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
_____)	
)	
JOHN T. MORRIS,)	CIVIL ACTION NO.
)	SA-11-CA-615-OLG-JES-XR
<i>Plaintiff,</i>)	[Consolidated case]
)	
v.)	
)	
STATE OF TEXAS, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
_____)	
)	
EDDIE RODRIGUEZ, <i>et al.</i> ,)	CIVIL ACTION NO.
)	SA-11-CA-635-OLG-JES-XR
<i>Plaintiffs,</i>)	[Consolidated case]
)	
v.)	
)	
RICK PERRY, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
_____)	

**DEFENDANTS’ DESIGNATION OF FACT WITNESSES,
EXPERTS, AND PROPOSED TRIAL EXHIBITS**

Pursuant to Federal Rule of Civil Procedure 26(a) and the Court’s August 1, 2011 Scheduling Order (Dkt. # 101), Defendants the State of Texas, Rick Perry, David Dewhurst, Hope Andrade, and Joe Straus, (collectively “Defendants”), hereby designate their fact witnesses, testifying experts, and trial exhibits. Defendants also incorporate by reference all persons and trial exhibits designated by Plaintiffs and Plaintiff-Intervenors in their designations of witnesses, testifying experts, and trial exhibits.

FACT WITNESSES

The Honorable Burt Solomons
Texas Representative and Chairman
Texas House Redistricting Committee
Room 1W.11 Capitol
P.O. Box 2910
Austin, Texas 78768
(512) 463-0478

Representative Solomons authored HB 150, which created the Texas House of Representatives Redistricting Plan H283 at issue in these consolidated cases. He also sponsored SB 4 in the Texas House of Representatives, which created the Texas Congressional Redistricting Plan C185, and which is also at issue in these cases. The scope of Representative Solomons's testimony will be determined in accordance with the Court's resolution of the legislative privilege issues raised by the parties.

The Honorable Kel Seliger
Texas Senator and Chairman,
Senate Select Committee on Redistricting
Capitol Extension, Room E1.606
P.O. Box 12068
Austin, Texas 78711
(512) 463-0131

Senator Seliger authored SB 4, which created the Texas Congressional Redistricting Plan C185 that is at issue in these consolidated cases. He also sponsored HB 150, which created the Texas House of Representatives Redistricting Plan H283, and which is also at issue in these cases. As Chairman of the Senate Select Committee on Redistricting, and bill author/sponsor for each plan, Senator Seliger may have information concerning the drawing of particular districts, debates concerning map lines, amendments to the bills that were offered, any alternative plans considered, and other matters related to 2010 redistricting and the State's efforts to comply with state and federal law, including the Voting Rights Act.

Ryan Downton
Committee Counsel
Texas House Redistricting Committee
E.2.1006, Capitol
P.O. Box 2910
Austin, Texas 78768
(512) 463-9948

Mr. Downton assisted with the drawing of the state House and Congressional maps in the Texas House of Representatives. He communicated directly with House members regarding their concerns and suggestions for map draws. The scope of Mr. Downton's testimony will be determined in accordance with the Court's resolution of the legislative privilege issues raised by the parties.

Gerardo Interiano
Counsel to the House Speaker
Room 2W.13, Capitol
P.O. Box 2910
Austin, Texas 78768
(512) 463-0921

Mr. Interiano assisted with the drawing of the state House and Congressional maps in the Texas House of Representatives. He communicated directly with House members and the public regarding their concerns and suggestions for map draws. The scope of Mr. Interiano's testimony will be determined in accordance with the Court's resolution of the legislative privilege issues raised by the parties.

Doug Davis
Counsel to the Senate Select Committee on Redistricting
P.O. Box 12068
Austin, Texas 78711
(512) 463-8802

Mr. Davis assisted with the drawing of the Senate and Congressional maps in the Texas Senate. He also coordinated, scheduled and attended all Senate Interim and Senate Redistricting

Committee Hearings. He provided legal counsel and guidance regarding compliance with state and federal law, including the Voting Rights Act.

David Hanna
Counsel
Texas Legislative Council
P.O. Box 12128
Austin, Texas 78711
(512) 463-1155

Jeff Archer
Counsel
Texas Legislative Council
P.O. Box 12128
Austin, Texas 78711
(512) 463-1155

Mr. Hanna and Mr. Archer provided legal analysis and guidance to Legislative staff and members regarding compliance requirements of state and federal law, including the Voting Rights Act, to include comparison analysis of proposed plans with benchmark plans.

Clare Dyer
Manager, Mapping & Redistricting Section
Texas Legislative Council
P.O. Box 12128
Austin, Texas 78711
(512) 463-1155

Ms. Dyer oversees the division at the Texas Legislative Council that produced the data, maps and reports that were provided to the Legislature during the redistricting process.

Bonnie Bruce
Chief of Staff for the Honorable Burt Solomons and
Clerk, Texas House Redistricting Committee
E.2.1006, Capitol
P.O. Box 2910
Austin, Texas 78768
(512) 463-9948

Ms. Bruce assisted with the coordination and scheduling of House redistricting hearings. She also attended and observed the House redistricting committee hearings related to the plans at issue in these cases, and the State Board of Education (SBOE) map.

Thomas Prasifka
Deputy Director of Support Operations
Correctional Institutions Division
Texas Department of Criminal Justice
P.O. Box 99
Huntsville, Texas 77342-0099
(936) 437-8702

Mr. Prasifka has access to information concerning the residency records that Texas keeps on its prisoner population.

Ron M. Pigott
Director, Texas Procurement and Support Services
Texas Comptroller of Public Accounts
P.O. Box 13528
Austin, Texas 78711
(512) 463-5038

Paul Gibson
Manager, Statewide HUB Program
Texas Comptroller of Public Accounts
P.O. Box 13528
Austin, Texas 78711
(512) 305-9071

Dr. Ron Haghighi
Texas Comptroller of Public Accounts
P.O. Box 13528
Austin, Texas 78711
(512) 475-0782

Mr. Pigott, Mr. Gibson and Dr. Haghighi will offer factual testimony about the extent to which minority group members bear the effects of past discrimination in the area of employment.

Specifically they will offer testimony describing Texas's Historically Underutilized Business (HUB) Program and its efforts to address disparities among minority-owned businesses in Texas.

Raymund Paredes, Ph.D.
Commissioner of Higher Education
Texas Higher Education Coordinating Board
1200 E. Anderson Lane
Austin, TX 78752
(512) 427-6101

Dr. Paredes will offer factual testimony regarding the extent to which minority group members bear the effects of past discrimination in the area of education. He will testify about the philosophy guiding THECB policies and his efforts as Commissioner to close the gaps between minority and non-minority students in Texas.

Custodian of Records
Secretary of State
Authentications Unit
P.O. Box 13550
Austin, TX 78711-3550

The Custodian of Records for the Secretary of State will testify as to the authenticity of certain election data and results.

RETAINED EXPERT WITNESSES

Norfleet W. Rives, Ph.D.
3630 Romnay Road
Columbus, OH 43220
614-326-0613

Dr. Rives, a demographer, has prepared a report regarding the demographic reports submitted by certain plaintiffs in this action, and the conclusions drawn in those reports.

John R. Alford, Ph.D.
Associate Professor
Rice University
15907 Erin Creek Court
Houston, TX 77062

Dr. Alford, a political scientist, has prepared a report detailing voting trends in specific campaigns in Texas, among various racial and ethnic groups, as such trends bear upon the voting-related

issues in this case. He has also analyzed voting trends and patterns in districts proposed by plaintiffs in this action.

NON-RETAINED EXPERT WITNESSES

Todd Giberson
Systems Analyst, Office of the Attorney General
PO Box 12548, 300 W. 12th Street,
Austin, TX 78711
Office phone: (512) 463-2161

Mr. Giberson has studied Redistricting since 1990 and has been an Analyst with the Office of the Attorney General since 1994. He has studied the characteristics of voting districts in certain of the maps proposed by the plaintiffs in this action, as well as those enacted by the Texas Legislature and addressed their characteristics as they relate to the voting issues in this case.

David Gardner, Ph.D.
Deputy Commissioner
Texas Higher Education Coordinating Board
1200 E. Anderson Lane
Austin, TX 78752
(512) 427-6146

Dr. Gardner has examined the higher education programs that the State of Texas offers minority residents (including members of the Latino community), and the measurable advancements the State has made in recent decades. Dr. Gardner will offer testimony about the THECB programs aimed at addressing inequities between minority and non-minority students in Texas.

The Honorable Larry Gonzales

Texas Representative
P.O. Box 2910
Austin, TX 78768
(512) 463-0670

Representative Gonzales represents Texas's 52nd House District. He will provide both fact and expert testimony concerning the political progress and dynamism of Texas's Hispanic population, the process of seeking elective office in Texas, the absence and ineffectiveness of overt and subtle

racial appeals in elections, and the opportunities that exist in representing a racially diverse constituency.

EXHIBITS

1	All exhibits offered by Plaintiffs and Intervenor in the above-captioned consolidated cases
2	All documents produced by Defendants the State of Texas, Rick Perry, David Dewhurst, Hope Andrade and Joe Straus and documents produced by Gerardo Interiano and Doug Davis in response to discovery requests directed to them by any party, electronically or in hard-copy, including, but not limited to, all documents uploaded to an ftp website and made available to parties to this action. For the documents produced by Gerardo Interiano, the scope of documents that Defendants will offer into evidence will depend on the Court's resolution of the legislative privilege issues raised by the parties.
3	2002 Election Data (1) 2002 Democratic Primary Election Returns (2) 2002 Democratic Primary ElectionVRTO (3) 2002 Democratic Runoff Election Returns (4) 2002 Democratic Runoff Election VRTO (5) 2002 Republican Primary Election Returns (6) 2002 Republican Primary Election VRTO (7) 2002 Republican Runoff Election Returns (8) 2002 Republican Runoff Election VRTO (9) 2002 General Election Returns (10) 2002 General Election VRTO
4	2004 Election Data (1) 2004 Democratic Primary Election Returns (2) 2004 Democratic Primary ElectionVRTO (3) 2004 Democratic Runoff Election Returns (4) 2004 Democratic Runoff Election VRTO (5) 2004 Republican Primary Election Returns (6) 2004 Republican Primary Election VRTO (7) 2004 Republican Runoff Election Returns (8) 2004 Republican Runoff Election VRTO (9) 2004 General ElectionReturns (10) 2004 General Election VRTO
5	2006 Election Data (1) 2006 Democratic Primary Election Returns (2) 2006 Democratic Primary ElectionVRTO (3) 2006 Democratic Runoff Election Returns (4) 2006 Democratic Runoff Election VRTO (5) 2006 Republican Primary Election Returns (6) 2006 Republican Primary Election VRTO (7) 2006 Republican Runoff Election Returns (8) 2006 Republican Runoff Election VRTO (9) 2006 General ElectionReturns (10) 2006 General Election VRTO (11) 2006 General Special Election Returns (12) 2006 General Special Election VRTO (13) 2006 Special Runoff Election Returns

	(14) 2006 Special Runoff Election VRTO
6	2008 Election Data (1) 2008 Democratic Primary Election Returns (2) 2008 Democratic Primary Election VRTO (3) 2008 Democratic Runoff Election Returns (4) 2008 Democratic Runoff Election VRTO (5) 2008 Republican Primary Election Returns (6) 2008 Republican Primary Election VRTO (7) 2008 Republican Runoff Election Returns (8) 2008 Republican Runoff Election VRTO (9) 2008 General Election Returns (10) 2008 General Election VRTO
7	2010 Election Data (1) 2010 Democratic Primary Election Returns (2) 2010 Democratic Primary Election VRTO (3) 2010 Democratic Runoff Election Returns (4) 2010 Democratic Runoff Election VRTO (5) 2010 Republican Primary Election Returns (6) 2010 Republican Primary Election VRTO (7) 2010 Republican Runoff Election Returns (8) 2010 Republican Runoff Election VRTO (9) 2010 General Election Returns (10) 2010 General Election VRTO
8	Officeholders for county-wide elected offices in Atascosa, Bee, Bexar, Brewster, Brooks, Cameron, Crockett, Culberson, Dallas, De Witt, Dimmit, Duval, Edwards, El Paso, Frio, Goliad, Gonzales, Guadalupe, Harris, Hidalgo, Hudspeth, Jeff Davis, Jim Hogg, Jim Wells, Karnes, Kenedy, Kinney, Kleberg, La Salle, Live Oak, McMullen, Maverick, Medina, Nueces, Pecos, Presidio, Reeves, Starr, Tarrant, Terrell, Uvalde, Val Verde, Victoria, Webb, Willacy, Wilson, and Zapata counties
9	2010 Census data by race and location
10	2007-2009 American Community Survey Three-Year Estimates and related reports, analyses, and underlying data
11	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for the benchmark Texas House and Congressional Plans
12	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for the recently enacted Texas House and Congressional Plans
13	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for Texas House Plan H292
14	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for Texas House Plan H201
15	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for Texas House Plan H205
16	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for Congressional Plan C190
17	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for Congressional Plan C163
18	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for Congressional Plan C164
19	Racially Polarized Voting Analysis, Reconstituted Election Analysis, and related reports, analyses, and underlying data for Congressional Plan C121
20	Straight Party Voting Analysis

21	Texas Comptroller of Public Accounts Statewide Historically Underutilized Business Program Education and Outreach Report Fiscal 2010
22	Texas Secretary of State Compilation of 2010 County Election Results for County Offices: County Clerks, County Judges, County Treasurers, Sheriffs
23	Texas Legislative Council Reports of SSVR County Registration Rates between 2000-2011
24	TLRTF 0023 April 14, 2011 Email from Lydia Camarillo to Nina Perales with excerpted news article on redistricting
25	TLRTF 0044 June 3, 2011 Email from Lydia Camarillo to Nina Perales with excerpted news article on redistricting
26	TLRTF 0105-06 MALDEF Press Release on Redistricting Litigation
27	TLRTF 0143 July 28, 2011 Email from Joey Cardenas to Mr. Ureste discussing the origins of the Texas Latino Redistricting Task Force
28	The Bylaws for Plaintiff Mexican American Legislative Caucus
29	House Journal, 82nd Legislature, First Called Session, June 14, 2011 Supplement (Congressional Plan)
30	House Journal, 82nd Legislature, Regular Session, April 27, 2011 Supplement (Texas House Plan)
31	Senate Journal, 82nd Legislature, First Called Session, June 6, 2011 Addendum (Congressional Plan)
32	Senate Journal, 82nd Legislature, Regular Session, May 17, 2011 (second reading) (Texas House Plan)
33	Senate Journal, 82nd Legislature, Regular Session, May 21, 2011 (third reading) (Texas House Plan)
34	<p>2010 Texas Legislative Redistricting Public Hearings: Texas House Interim Public Hearings Transcripts (available:http://www.house.state.tx.us/videoaudio/committeebroadcasts/committeearchives/?committee=080&session=81):</p> <p>(1) 6/2/2010 Joint Hearing: House Redistricting and House Judiciary and Civil Jurisprudence (Austin)</p> <p>(2) 6/21/2010 Joint Hearing: House Redistricting Subcommittee on San Antonio Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(3) 7/19/2010 Joint Hearing: House Redistricting Subcommittee on McAllen Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(4) 7/20/2010 Joint Hearing: House Redistricting Subcommittee on Laredo Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(5) 7/21/2010 Joint Hearing: House Redistricting Subcommittee on Corpus Christi Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(6) 8/16/2010 Joint Hearing: House Redistricting Subcommittee on El Paso Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(7) 8/18/2010 Joint Hearing: House Redistricting Subcommittee on Lubbock Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(8) 9/20/2010 Joint Hearing: House Redistricting, House Judiciary and Civil Jurisprudence Subcommittee on Downtown Dallas Redistricting and Senate Select Committee on Redistricting</p> <p>(9) 9/21/2010 Joint Hearing: House Redistricting Subcommittee on Tarrant County Redistricting, House Judiciary and Civil Jurisprudence</p> <p>(10) 9/22/2010 Joint Hearing: House Redistricting Subcommittee on Richardson/UT-Dallas Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(11) 10/18/2010 Joint Hearing: House Redistricting Subcommittee on Beaumont Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(12) 10/20/2010 Joint Hearing: House Redistricting Subcommittee on Marshall Redistricting and House Judiciary and Civil Jurisprudence</p> <p>(13) 11/17/2010 House Redistricting Subcommittee on Austin Redistricting</p>

	<p>(14) 11/20/2010 Joint Hearing: Subcommittee of Judiciary and Civil Jurisprudence and Senate Select Committee on Redistricting (Houston)</p> <p>(15) 3/1/2011 Hearing - House Committee on Redistricting, Austin – informational meeting, invited testimony from Texas Legislative Council and State Demographer</p> <p>(16) 3/15/2011 Hearing – House Committee on Redistricting, Austin – meeting on potential State Board of Education districts in light of the 2010 census</p> <p>(17) 3/24/2011 Hearing - House Committee on Redistricting, Austin – meeting on potential Texas House districts in light of the 2010 census</p> <p>(18) 3/25/2011 Hearing - House Committee on Redistricting, Austin – hearing on HB 600, SBOE map</p> <p>(19) 4/1/2011 Formal Meeting to consider pending business – no recording</p> <p>(20) 4/7/2011 Hearing - House Committee on Redistricting, Austin – meeting on potential congressional districts in light of the 2010 census</p> <p>(21) 4/15/2011 Hearing - House Committee on Redistricting, Austin, hearing on HB 150, House map</p> <p>(22) 4/17/2011 Hearing – House Committee on Redistricting, Austin – hearing on HB 150, House map</p> <p>(23) 4/19/2011 Formal Meeting to consider pending business – no recording</p> <p>(24) 5/18/2011 Formal Meeting to consider SB 31, Senate map – no recording</p> <p>(25) 6/2/2011 Hearing – House Committee on Redistricting, Austin – hearing on HB 4, congressional map</p> <p>(26) 6/9/2011 Formal Meeting to consider pending business</p>
35	<p>2010 Texas Legislative Redistricting Public Hearings: Senate Interim Public Hearing Transcripts (available at http://www.senate.state.tx.us/75r/Senate/commit/c625/c625_81.htm)</p> <p>(1) 9/1/2010 Austin</p> <p>(2) 9/20/2010 Joint Hearing: House Redistricting, House Judiciary and Civil Jurisprudence Subcommittee on Downtown Dallas Redistricting and Senate Select Committee on Redistricting</p> <p>(3) 10/4/2010 Amarillo</p> <p>(4) 10/5/2010 Midland</p> <p>(5) 10/21/2010 Edinburg</p> <p>(6) 11/4/2010 San Antonio</p> <p>(7) 11/20/2010 Joint Hearing: Subcommittee of Judiciary and Civil Jurisprudence and Senate Select Committee on Redistricting (Houston)</p> <p>(8) 2/16/2011 Austin</p> <p>(9) 4/27/2011 Austin</p> <p>(10) 5/4/2011 Austin</p> <p>(11) 5/6/2011 Austin</p> <p>(12) 5/12/2011 Austin</p> <p>(13) 5/13/2011 Austin</p> <p>(14) 5/17/2011 Austin – Senate Session</p> <p>(15) 5/21/2011 Austin – Senate Session</p> <p>(16) 6/3/2011 Austin – considering SB 4, congressional map</p>
36	<p>2010 Texas Legislative Redistricting Public Hearings: Texas 82nd Legislature House Redistricting Committee Hearings on Congressional Maps:</p> <p>(1) April 7 House Committee Hearing</p> <p>(a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C0802011040709001.PDF</p> <p>(b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C0802011040709001.PDF</p> <p>(c) Witness List: http://www.capitol.state.tx.us/tlodocs/82R/witlistmtg/pdf/C0802011040709001.PDF</p> <p>(d) Transcript</p>

	<p>2) June 2 House Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C0802011060210451.PDF (b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C0802011060210451.PDF (c) Witness List: http://www.capitol.state.tx.us/tlodocs/82R/witlistmtg/pdf/C0802011060210451.PDF (d) Transcript</p> <p>(3) June 9 House Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C0802011060909001.PDF (b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C0802011060909001.PDF (c) Transcript</p>
37	<p>2010 Texas Legislative Redistricting Public Hearings Texas 82nd Legislature House Redistricting Committee Hearings on House Maps :</p> <p>(1) April 15 House Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C0802011041512001.PDF (b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C0802011041512001.PDF (c) Witness List http://www.capitol.state.tx.us/tlodocs/82R/witlistmtg/pdf/C0802011041512001.PDF (d) Transcript</p> <p>(2) April 17 House Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C0802011041714001.PDF (b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C0802011041714001.PDF (c) Witness List: http://www.capitol.state.tx.us/tlodocs/82R/witlistmtg/pdf/C0802011041714001.PDF (d) Transcript</p> <p>(3) April 19 House Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C0802011041911001.PDF (b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C0802011041911001.PDF (c) Transcript</p>
38	<p>2010 Texas Legislative Redistricting Public Hearings Texas 82nd Legislature Senate Select Committee on Redistricting Hearings on Congressional Maps:</p> <p>(1) June 3 Senate Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C6252011060309001.PDF (b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C6252011060309001.PDF (c) Witness List: http://www.capitol.state.tx.us/tlodocs/82R/witlistmtg/pdf/C6252011060309001.PDF (d) Transcript</p>
39	<p>2010 Texas Legislative Redistricting Public Hearings Texas 82nd Legislature Senate Select Committee Redistricting Hearings on House Maps:</p> <p>(1) May 6 Senate Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C6252011050609001.PDF (b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C6252011050609001.PDF (c) Witness List: http://www.capitol.state.tx.us/tlodocs/82R/witlistmtg/pdf/C6252011050609001.PDF (d) Transcript</p> <p>(2) May 13 Senate Committee Hearing: (a) Notice: http://www.capitol.state.tx.us/tlodocs/82R/schedules/pdf/C6252011051308001.PDF</p>

	(b) Minutes: http://www.capitol.state.tx.us/tlodocs/82R/minutes/pdf/C6252011051308001.PDF (c) Transcript
40	Texas Congressional Benchmark Plan C100 Maps a. Maps of state and split counties with districts b. Maps of split counties with racial/ethnic shading by VTD c. Maps of split counties with Spanish surname voter registration by VTD d. Maps of split counties with natural boundaries and geographic features e. Maps of split counties with cities
41	Texas House Benchmark Plan H100 Maps a. Maps of state and split counties with districts b. Maps of split counties with racial/ethnic shading by VTD c. Maps of split counties with Spanish surname voter registration by VTD d. Maps of split counties with natural boundaries and geographic features e. Maps of split counties with cities
42	Texas Congressional Redistricting Plan C185 Maps a. Maps of state and split counties with districts b. Maps of split counties with racial/ethnic shading by VTD c. Maps of split counties with Spanish surname voter registration by VTD d. Maps of split counties with natural boundaries and geographic features e. Maps of split counties with cities
43	Texas House Redistricting Plan H283 Maps a. Maps of state and split counties with districts b. Maps of split counties with racial/ethnic shading by VTD c. Maps of split counties with Spanish surname voter registration by VTD d. Maps of split counties with natural boundaries and geographic features e. Maps of split counties with cities
44	Public Maps Considered by the 82nd Legislature a. Shapefiles of 54 public Texas Congressional plans b. Shapefiles of 111 public Texas House plans
45	Texas Legislative Council Reports a. Plan Overlap Analysis-Comparing Plans C185 and C100 b. Plan Overlap Analysis-Comparing Plans H283 and H100 c. Two-Plan Comparison by Incumbent-Comparing Plans C185 and C100 d. Two-Plan Comparison by Incumbent-Comparing Plans H283 and H100 e. Election Analysis of Congressional Districts under Plan C100 using 2010 General Election and 2010 Census Data f. Election Analysis of Congressional Districts under Plan C185 using 2010 General Election and 2010 Census Data g. Election Analysis of Congressional Districts under Plan H100 using 2010 General Election and 2010 Census Data h. Election Analysis of Congressional Districts under Plan H283 using 2010 General Election and 2010 Census Data i. American Community Survey (ACS) Special Tabulation with Special Tabulation of Citizen Voting Age Population (CVAP) under Plan C185 using 2010 Census and 2005-2009 ACS data j. American Community Survey (ACS) Special Tabulation with Special Tabulation of Citizen Voting Age Population (CVAP) under Plan C100 using 2010 Census and 2005-2009 ACS data k. American Community Survey (ACS) Special Tabulation with Special Tabulation of Citizen Voting Age Population (CVAP) under Plan H283 using 2010 Census and 2005-2009 ACS data l. American Community Survey (ACS) Special Tabulation with Special Tabulation of Citizen Voting Age Population (CVAP) under Plan H100 using 2010 Census and 2005-2009 ACS data

	m. Compactness Analysis under Plan C185 using 2010 Census data n. Compactness Analysis under Plan C100 using 2010 Census data o. Compactness Analysis under Plan H283 using 2010 Census data p. Compactness Analysis under Plan H100 using 2010 Census data q. District Population Analysis under Plan C185 using 2010 Census data r. District Population Analysis under Plan C100 using 2010 Census data s. District Population Analysis under Plan H283 using 2010 Census data t. District Population Analysis under Plan H100 using 2010 Census data u. List of Incumbents by Congressional Districts for Plan C185 v. List of Incumbents by Congressional Districts for Plan C100 w. List of Incumbents by Congressional Districts for Plan H283 x. List of Incumbents by Congressional Districts for Plan H100 y. Analysis of Population and Voter Data with Voter Registration Comparison for C185 plan z. Analysis of Population and Voter Data with Voter Registration Comparison for C100 plan aa. Analysis of Population and Voter Data with Voter Registration Comparison for H283 plan bb. Analysis of Population and Voter Data with Voter Registration Comparison for H100 plan cc. Analysis of Split Cities and Census Designated Places (CDPs) by District for Plan C185 dd. Analysis of Split Cities and Census Designated Places (CDPs) by District for Plan C100 ee. Analysis of Split Cities and Census Designated Places (CDPs) by District for Plan H283 ff. Analysis of Split Cities and Census Designated Places (CDPs) by District for Plan H100.
46	Transcript of, and exhibits to, the deposition of Trey Martinez Fischer and Veronica Gonzales
47	Transcript of, and exhibits to, the deposition of Celeste Villarreal
48	Transcript of, and exhibits to, the deposition of Lydia Camarillo
49	Transcript of, and exhibits to, the deposition of Baldomera Garza
50	Transcript of, and exhibits to, the deposition of Anthony Gutierrez
51	Transcript of, and exhibits to, the deposition of Doug Davis
52	Transcript of, and exhibits to, the deposition of Ryan Downton, Parts I and II; the scope of testimony and exhibits that Defendants will offer into evidence will depend on the Court's resolution of the legislative privilege issues raised by the parties
53	Transcript of, and exhibits to, the deposition of Gerardo Interiano, Parts I, II and III; the scope of testimony and exhibits that Defendants will offer into evidence will depend on the Court's resolution of the legislative privilege issues raised by the parties
54	Transcript of, and exhibits to, the deposition of Jeff Archer
55	Transcript of, and exhibits to, the deposition of Harold Dutton, Jr.
56	Transcript of, and exhibits to, the deposition of Susan Gonzales-Baker
57	Transcript of, and exhibits to, the deposition of Andre Tijerina
58	Transcript of, and exhibits to, the deposition of Jorge Chapa
59	Transcript of, and exhibits to, the deposition of J. Morgan Kousser
60	Transcript of, and exhibits to, the deposition of Marc Veasey
61	Transcript of, and exhibits to, the deposition of Richard Engstrom
62	Transcript of, and exhibits to, the deposition of Henry Flores
63	Transcript of, and exhibits to, the deposition of Stephen Anasolabehere
64	Transcript of, and exhibits to, the deposition of Michael McDonald
65	Transcript of, and exhibits to, the deposition of Allan Lichtman
66	Transcript of, and exhibits to, the deposition of Orville Burton
67	Transcript of, and exhibits to, the deposition of Richard Murray
68	Transcript of, and exhibits to, the deposition of Anthony Fairfax
69	Transcript of, and exhibits to, the deposition of William Piatt
70	Transcript of, and exhibits to, the deposition of George Korbel
71	Transcript of, and exhibits to, the deposition of Hon. Kel Seliger pending the Court's determination

	of legislative privilege issues
72	Transcript of, and exhibits to, the deposition of Chairman Burt Solomons the scope of testimony and exhibits that Defendants will offer into evidence will depend on the Court's resolution of the legislative privilege issues raised by the parties
73	Transcript of, and exhibits to, the deposition of Ed Martin
74	Transcript of, and exhibits to, the deposition of Robert Jara
75	Transcript of, and exhibits to, the deposition of James Aldrete
76	Transcript of, and exhibits to, the deposition of Jeff Smith
77	Transcript of, and exhibits to, the deposition of Pete Gallego
78	Transcript of, and exhibits to, the deposition of Roberto Alonza
79	Transcript of, and exhibits to, the deposition of Jessica Ferrar
80	Transcript of, and exhibits to, the deposition of John T. Morris
81	Transcript of, and exhibits to, the deposition of Eddie Rodriguez
82	Transcript of, and exhibits to, the deposition of Sheila Jackson-Lee
83	Transcript of, and exhibits to, the deposition of Alexander Green
84	Transcript of, and exhibits to, the deposition of Henry Cuellar
85	Transcript of, and exhibits to, the depositions of any other witnesses that the parties have agreed or will agree to produce for deposition
86	Expert report, inclusive of exhibits and supporting data, prepared by Bill Rives
87	Expert report, inclusive of exhibits and supporting data, prepared by John Alford
88	Expert report, inclusive of exhibits and supporting data, prepared by Todd Giberson
89	Expert report, inclusive of exhibits and supporting data, prepared by David Gardner on "Hispanic Participation and Success in Texas Higher Education"
90	Interrogatory responses, supplemental responses and responses to Requests For Admission by Gregory Tamez
91	Interrogatory responses, supplemental responses and responses to Requests For Admission by Dorothy DeBose
92	Interrogatory responses, supplemental responses and responses to Requests For Admission by Sergio Salinas
93	Interrogatory responses, supplemental responses and responses to Requests For Admission by Carmen Rodriguez
94	Interrogatory responses, supplemental responses and responses to Requests For Admission by Nancy Hall
95	Interrogatory responses, supplemental responses and responses to Requests For Admission by Rudolpho Ortiz
96	Interrogatory responses, supplemental responses and responses to Requests For Admission by Shannon Perez
97	Interrogatory responses, supplemental responses and responses to Requests For Admission by Harold Dutton, Jr.
98	Interrogatory responses, supplemental responses and responses to Requests For Admission by Joey Cardenas
99	Interrogatory responses, supplemental responses and responses to Requests For Admission by Alex Jimenez
100	Interrogatory responses, supplemental responses and responses to Requests For Admission by Emelda Menendez
101	Interrogatory responses, supplemental responses and responses to Requests For Admission by Tomacita Olivares
102	Interrogatory responses, supplemental responses and responses to Requests For Admission by Jose Olivares

103	Interrogatory responses, supplemental responses and responses to Requests For Admission by Alejandro Ortiz
104	Interrogatory responses, supplemental responses and responses to Requests For Admission by Rebecca Ortiz
105	Interrogatory responses, supplemental responses and responses to Requests For Admission by Medical American Legislative Caucus
106	Interrogatory responses, supplemental responses and responses to Requests For Admission by John T. Morris
107	Interrogatory responses, supplemental responses and responses to Requests For Admission by Eddie Rodriguez
108	Interrogatory responses, supplemental responses and responses to Requests For Admission by Milton Gerald Washington
109	Interrogatory responses, supplemental responses and responses to Requests For Admission by Bruce Elephant
110	Interrogatory responses, supplemental responses and responses to Requests For Admission by Alex Serna
111	Interrogatory responses, supplemental responses and responses to Requests For Admission by Sandra Serna
112	Interrogatory responses, supplemental responses and responses to Requests For Admission by Betty F. Lopez
113	Interrogatory responses, supplemental responses and responses to Requests For Admission by David Gonzalez
114	Interrogatory responses, supplemental responses and responses to Requests For Admission by Beatrice Saloma
115	Interrogatory responses, supplemental responses and responses to Requests For Admission by Jose Norberto Rivera
116	Interrogatory responses, supplemental responses and responses to Requests For Admission by Travis County
117	Interrogatory responses, supplemental responses and responses to Requests For Admission by City of Austin
118	Interrogatory responses, supplemental responses and responses to Requests For Admission by Mark Washburn
119	Interrogatory responses, supplemental responses and responses to Requests For Admission by Margarita V. Quesada
120	Interrogatory responses, supplemental responses and responses to Requests For Admission by Romeo Munoz
121	Interrogatory responses, supplemental responses and responses to Requests For Admission by Marc Veasey
122	Interrogatory responses, supplemental responses and responses to Requests For Admission by Jane Hamilton
123	Interrogatory responses, supplemental responses and responses to Requests For Admission by Lyman King
124	Interrogatory responses, supplemental responses and responses to Requests For Admission by John Jenkins
125	Interrogatory responses, supplemental responses and responses to Requests For Admission by Sandra Puente
126	Interrogatory responses, supplemental responses and responses to Requests For Admission by Debbi Allen
127	Interrogatory responses, supplemental responses and responses to Requests For Admission by Jamaal R. Smith

128	Interrogatory responses, supplemental responses and responses to Requests For Admission by Kathleen Maria Shaw
129	Interrogatory responses, supplemental responses and responses to Requests For Admission by Romeo Munoz
130	Interrogatory responses, supplemental responses and responses to Requests For Admission by Howard Jefferson
131	Interrogatory responses, supplemental responses and responses to Requests For Admission by Juanita Wallace
132	Interrogatory responses, supplemental responses and responses to Requests For Admission by Rev. Bill Lawson
133	Interrogatory responses, supplemental responses and responses to Requests For Admission by Boyd Richie
134	Interrogatory responses, supplemental responses and responses to Requests For Admission by Florinda Chavez
135	Interrogatory responses, supplemental responses and responses to Requests For Admission by Renato De Los Santos
136	Interrogatory responses, supplemental responses and responses to Requests For Admission by Sergio Coronado
137	Interrogatory responses, supplemental responses and responses to Requests For Admission by Cynthia Valadez
138	Interrogatory responses, supplemental responses and responses to Requests For Admission by Gregorio Palmino
139	Interrogatory responses, supplemental responses and responses to Requests For Admission by Cesar Yevenes
140	Interrogatory responses, supplemental responses and responses to Requests For Admission by Gilberto Torres
141	Interrogatory responses, supplemental responses and responses to Requests For Admission by Gabriela Rosales
142	Interrogatory responses and supplemental responses by Texas Latino Redistricting Task Force
143	Interrogatory responses, supplemental responses and responses to Requests For Admission by Texas Conference of NAACP Branches
144	Interrogatory responses and supplemental responses by Mexican American Legislative Caucus
145	Interrogatory responses and supplemental responses by Texas Democratic Party
146	Interrogatory responses, supplemental responses and responses to Requests For Admission by LULAC

Dated: August 22, 2011

Respectfully Submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

BILL COBB
Deputy Attorney General for Civil Litigation

DAVID C. MATTAX
Director of Defense Litigation

J. REED CLAY, JR.
Special Assistant and Senior Counsel
to the Attorney General

/s/ David Schenck
DAVID SCHENCK
Deputy Attorney General for Legal Counsel
Texas Bar No. 17736870

MATTHEW H. FREDERICK
Special Counsel to the Attorney General
Texas Bar No. 24040931

ANGELA COLMENERO
Assistant Attorney General
Texas Bar No. 24048399

ANA MARIE JORDAN
Assistant Attorney General
Texas Bar No. 00790748

P.O. Box 12548, Capitol Station
Austin, TX 78711-2548
(512) 936-1342
(512) 936-0545 (fax)

**ATTORNEYS FOR THE STATE OF TEXAS,
RICK PERRY, DAVID DEWHURST, JOE
STRAUS, AND HOPE ANDRADE**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing was sent via the Court's electronic notification system and/or email to the following counsel of record on August 22, 2011, to:

Via CM/ECF

DAVID RICHARDS
Texas Bar No. 1684600
Richards, Rodriguez & Skeith LLP
816 Congress Avenue, Suite 1200
Austin, TX 78701
512-476-0005
davidr@rrsfirm.com

RICHARD E. GRAY, III
State Bar No. 08328300
Gray & Becker, P.C.
900 West Avenue, Suite 300
Austin, TX 78701
512-482-0061/512-482-0924 (facsimile)
Rick.gray@graybecker.com
**ATTORNEYS FOR PLAINTIFFS PEREZ,
DUTTON, TAMEZ, HALL, ORTIZ,
SALINAS, DEBOSE, and RODRIGUEZ**

JOSE GARZA
Texas Bar No. 07731950
Law Office of Jose Garza
7414 Robin Rest Dr.
San Antonio, Texas 78209
210-392-2856
garzpalm@aol.com

MARK W. KIEHNE
mkiehne@lawdcm.com
RICARDO G. CEDILLO
rcedillo@lawdcm.com
Davis, Cedillo & Mendoza
McCombs Plaza
755 Mulberry Ave., Ste. 500
San Antonio, TX 78212
210-822-6666/210-822-1151 (facsimile)
**ATTORNEYS FOR MEXICAN AMERICAN
LEGISLATIVE CAUCUS**

GERALD H. GOLDSTEIN
State Bar No. 08101000
ggandh@aol.com
DONALD H. FLANARY, III
State Bar No. 24045877
donflanary@hotmail.com
Goldstein, Goldstein and Hilley
310 S. St. Mary's Street
29th Floor, Tower Life Bldg.
San Antonio, TX 78205-4605
210-226-1463
210-226-8367 (facsimile)

PAUL M. SMITH
MICHAEL B. DESANCTIS
JESSICA RING AMUNSON
Jenner & Block LLP
1099 New York Ave., NW
Washington, D.C. 20001
202-639-6000

J. GERALD HEBERT
191 Somerville Street, # 405
Alexandria, VA 22304
703-628-4673
hebert@voterlaw.com

JESSE GAINES
P.O. Box 50093
Fort Worth, TX 76105
817-714-9988

**ATTORNEYS FOR PLAINTIFFS
QUESADA, MUNOZ, VEASEY,
HAMILTON, KING and JENKINS**

NINA PERALES
Texas Bar No. 24005046
nperales@maldef.org
MARISA BONO
mbono@maldef.org
REBECCA MCNEILL COUTO
rcouto@maldef.org
Mexican American Legal Defense
and Education Fund
110 Broadway, Suite 300
San Antonio, TX 78205
210-224-5476/(210) 224-5382 (facsimile)

MARK ANTHONY SANCHEZ
masanchez@gws-law.com
ROBERT W. WILSON
rwwilson@gws-law.com
Gale, Wilson & Sanchez, PLLC
115 East Travis Street, Ste. 1900
San Antonio, TX 78205
210-222-8899/210-222-9526 (facsimile)
**ATTORNEYS FOR PLAINTIFFS TEXAS
LATINO REDISTRICTING TASK FORCE,
CARDENAS, JIMENEZ, MENENDEZ,
TOMACITA AND JOSE OLIVARES,
ALEJANDRO AND REBECCA ORTIZ**

JOHN T. MORRIS
5703 Caldicote St.
Humble, TX 77346
281-852-6388
JOHN T. MORRIS, PRO SE

MAX RENE HICKS
Law Office of Max Renea Hicks
101 West Sixth Street Suite 504
Austin, TX 78701
512-480-8231/512-480-9105 (facsimile)
rhicks@renea-hicks.com
**ATTORNEY FOR PLAINTIFFS CITY OF
AUSTIN, TRAVIS COUNTY, ALEX
SERNA, BEATRICE SALOMA, BETTY F.
LOPEZ, CONSTABLE BRUCE ELFANT,
DAVID GONZALEZ, EDDIE RODRIGUEZ,
MILTON GERARD WASHINGTON, and
SANDRA SERNA**

LUIS ROBERTO VERA, JR.
Law Offices of Luis Roberto Vera, Jr. &
Associates
1325 Riverview Towers
111 Soledad
San Antonio, Texas 78205-2260
210-225-3300
irvlaw@sbcglobal.net

GEORGE JOSEPH KORBEL
Texas Rio Grande Legal Aid, Inc.
1111 North Main
San Antonio, TX 78213
210-212-3600
korbellaw@hotmail.com
**ATTORNEYS FOR INTERVENOR-
PLAINTIFF LEAGUE OF UNITED
LATIN AMERICAN CITIZENS**

ROLANDO L. RIOS
Law Offices of Rolando L. Rios
115 E Travis Street
Suite 1645
San Antonio, TX 78205
210-222-2102
rrios@rolandorioslaw.com
**ATTORNEY FOR INTERVENOR-
PLAINTIFF HENRY CUELLAR**

GARY L. BLEDSOE
State Bar No.: 02476500
Law office of Gary L. Bledsoe
316 W. 12th Street, Ste. 307
Austin, TX 78701
512-322-9992/512-322-0840 (facsimile)
garybledsoe@sbcglobal.net
**ATTORNEY FOR INTERVENOR-
PLAINTIFFS TEXAS STATE
CONFERENCE OF NAACP BRANCHES,
TEXAS LEGISLATIVE BLACK
CAUCUS, EDDIE BERNICE JOHNSON,
SHEILA JACKSON-LEE, ALEXANDER
GREEN, HOWARD JEFFERSON, BILL
LAWSON, and JUANITA WALLACE**

STEPHEN E. MCCONNICO

smcconnico@scottdoug.com

SAM JOHNSON

sjohnson@scottdoug.com

S. ABRAHAM KUCZAJ, III

akuczaj@scottdoug.com

Scott, Douglass & McConnico

One American Center

600 Congress Ave., 15th Floor

Austin, TX 78701

512-495-6300/512-474-0731 (facsimile)

**ATTORNEYS FOR PLAINTIFFS CITY OF
AUSTIN, TRAVIS COUNTY, ALEX
SERNA, BALAKUMAR PANDIAN,
BEATRICE SALOMA, BETTY F. LOPEZ,
CONSTABLE BRUCE ELFANT, DAVID
GONZALEZ, EDDIE RODRIGUEZ, ELIZA
ALVARADO, JOSEY MARTINEZ,
JUANITA VALDEZ-COX, LIONOR
SOROLA-POHLMAN, MILTON GERARD
WASHINGTON, NINA JO BAKER, and
SANDRA SERNA**

CHAD W. DUNN

chad@brazilanddunn.com

K. SCOTT BRAZIL

scott@brazilanddunn.com

Brazil & Dunn

4201 FM 1960 West, Suite 530

Houston, TX 77068

281-580-6310/281-580-6362 (facsimile)

**ATTORNEYS FOR INTERVENOR-
DEFENDANTS TEXAS DEMOCRATIC
PARTY and BOYD RICHIE**

VICTOR L. GOODE

Asst. Gen. Counsel, NAACP

4805 Mt. Hope Drive

Baltimore, MD 21215-5120

410-580-5120/410-358-9359 (facsimile)

vgoode@naacpnet.org

**ATTORNEYS FOR INTERVENOR-
PLAINTIFF THE TEXAS STATE
CONFERENCE OF NAACP BRANCHES**

ROBERT NOTZON

State Bar No. 00797934

Law Office of Robert S. Notzon

1507 Nueces Street

Austin, TX 78701

512-474-7563/512-474-9489 (facsimile)

robert@notzonlaw.com

ALLISON JEAN RIGGS

ANITA SUE EARLS

Southern Coalition for Social Justice

1415 West Highway 54, Ste. 101

Durham, NC 27707

919-323-3380/919-323-3942 (facsimile)

anita@southerncoalition.org

**ATTORNEYS FOR INTERVENOR-
PLAINTIFFS TEXAS STATE
CONFERENCE OF NAACP BRANCHES,
EARLS, LAWSON, WALLACE, and
JEFFERSON**

DONNA GARCIA DAVIDSON

PO Box 12131

Austin, TX 78711

(512) 775-7625/(877) 200-6001 (facsimile)

donna@dgdlawfirm.com

FRANK M. REILLY

Potts & Reilly, L.L.P.

P.O. Box 4037

Horseshoe Bay, TX 78657

512-469-7474/512-469-7480 (facsimile)

reilly@pottsreilly.com

**ATTORNEYS FOR DEFENDANT STEVE
MUNISTERI**

Via Email

JOAQUIN G. AVILA
P.O. Box 33687
Seattle, WA 98133
206-724-3731/206-398-4261 (facsimile)
jgavotingrights@gmail.com
**ATTORNEYS FOR MEXICAN
AMERICAN LEGISLATIVE CAUCUS**

KAREN M. KENNARD
2803 Clearview Drive
Austin, TX 78703
512-974-2177/512-974-2894 (facsimile)
**ATTORNEY FOR PLAINTIFF
CITY OF AUSTIN**

DAVID ESCAMILLA
Travis County Asst. Attorney
P.O. Box 1748
Austin, TX 78767
512-854-9416
**ATTORNEY FOR PLAINTIFF
TRAVIS COUNTY**

/s/ David J. Schenck
DAVID J. SCHENCK
Deputy Attorney General for Legal Counsel